



Secretary/Treasurer:
THOMAS ASSOCIATES, INC.

March 7, 2014

Ms. Janet L. Buyer
Project Manager
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

SUBJECT: PGMA Comments on CPSC Staff Request for Formation of a Working Group and CPSC Staff's Recommendations for Requirements to Address the CO Poisoning Hazard Associated with Portable Generators

Dear Ms. Buyer:

The Portable Generator Manufacturers' Association (PGMA) would like to offer its comments on CPSC's letter to Underwriters Laboratories, Inc. dated January 14, 2014 regarding "CPSC Staff Request for Formation of a Working Group and Staff's Recommendations for Requirements to Address the Carbon Monoxide Poisoning Hazard Associated with Portable Generators".

PGMA is a trade association that seeks to develop and influence safety and performance standards for our industry's products. As the history of both PGMA and the individual members of PGMA demonstrate, our commitment to safety is sincere and backed by repeated actions. Since our members include the major industry manufacturers of portable generators sold in North America and a significant majority of the industry, we are the recognized voice of the portable generator industry, particularly with respect to the paramount issue of the safety of our respective customers.

Our member companies include:

- American Honda Motor Company
- Briggs & Stratton Power Products Group
- Champion Power Equipment
- Generac Power Systems
- Pramac America
- Subaru Industrial Power

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- Techtronic Industries, North America
- Wacker Neuson Production Americas
- Yamaha Motor Corporation USA

I. IT IS NOT APPROPRIATE TO ESTABLISH A WORKING GROUP TO MODIFY UL 2201

PGMA does not believe that establishing a working group to develop proposals for modifying UL 2201 would be an effective method for improving the safe and proper use of portable generators, for the reasons detailed below:

- UL 2201 was first published in March 2009 without an ANSI designation. The Standards Technical Panel for UL 2201 was unable to achieve the necessary consensus for ANSI designation despite over six years of effort prior to March 2009. During this time period, there were five failed ballots for ANSI designation.
- Since UL 2201 was published nearly five years ago, PGMA is not aware of any portable generator manufacturer that has a listing to this standard.
- In January 2013, PGMA provided UL with a list of 37 remaining issues with UL 2201.
- It is not appropriate for UL to form a Working Group in advance of CPSC responding to all the public comments it received on the report entitled "Technology Demonstration of a Prototype Low Carbon Monoxide Emission Portable Generator" that was released in September , 2012.

II. CPSC SHOULD SUPPORT PGMA's ANSI ACTIVITIES

- PGMA was approved as an ANSI accredited standards developer in December 2011, and submitted a PINS for a safety standard for portable generators in May 2012.
- PGMA plans to begin the ANSI canvassing process for the safety standard in 2014. We plan to invite personnel from CPSC and UL to participate in the canvass.

III. CPSC NEEDS TO CONDUCT A STUDY TO DETERMINE WHETHER REDUCING CO EMISSIONS WILL REDUCE THE NUMBER OF CO DEATHS FROM PORTABLE GENERATORS

The letter suggests that the development of CO emission rate limits would "address the source of the hazard and make a direct impact on reducing the risk of CO poisoning death and injury associated with the use of portable generators". This appears to be based on the premise in the CPSC report entitled "Technology Demonstration of a Prototype Low Carbon Monoxide Emission Portable Generator" (released in September 2012) that reduced CO emission rates from common portable generators "can provide additional critical time for consumers to recognize and escape," and thus reduce the number of CO deaths from portable generators. PGMA is not aware of any documentation or studies confirming the validity of that premise. Given the importance of the premise to the report, PGMA encourages CPSC to provide the study on which the premise is based or to

conduct a study to validate it. While the proposition may seem intuitive, it could also be possible that someone experiencing minor symptoms from reduced CO emissions will be even less likely to attribute them to CO than someone exposed to emissions from an unmodified generator. Moreover, decreasing the rate of symptom onset would not benefit someone who is sleeping and could reduce awareness that a serious problem is at hand.

There are, as you are certainly aware, no warning signs commonly and uniquely associated with carbon monoxide poisoning regardless of how quickly the carbon monoxide poisoning occurs or begins to occur. This is because the headache and nausea associated with carbon monoxide poisoning are such common, everyday occurrences for virtually everyone that it is questionable whether those symptoms would be recognized as being caused by carbon monoxide exposure. Indeed, a person experiencing the symptoms of carbon monoxide poisoning may decide to take a couple of pain relievers and/or sleeping aids and go to bed, rather than go outside. Empirical data would be extremely valuable, and probably necessary, to support the proposition that a consumer experiencing early reactions to carbon monoxide poisoning would realize the source of the symptoms as carbon monoxide and react in the manner desired, that is to quickly remove himself or herself from the area to a place where there was fresh, untainted air.

IV. CPSC SHOULD CONDUCT A HUMAN FACTORS STUDY TO EVALUATE THE EFFECTIVENESS OF THE EXISTING MANDATORY CO LABEL AND REVISE IT TO CONFORM WITH ANSI Z535

We wholeheartedly agree with the statement in the CPSC's Press Release for the report that recognizes that a carbon monoxide (CO) hazard would continue to exist even if the technology applied to the prototype generator were applied to commercially available generators, and that educating owners about the proper use of their generators will therefore remain the first line of defense:

“The CPSC continues to urge consumers to never run their portable generators in their attached garages, in or even near their houses, including avoiding placement near windows or vents. Generators should only be used outside, far away from homes. CPSC cautions that even if portable gasoline powered generators were to incorporate this technology, they would still need to be used outside, far from the home. The technology does not make them safe for indoor use.” (CPSC Press Release #12-278, September 14, 2012).

For this reason, PGMA encourages CPSC to review all In-Depth Investigation (IDI) reports involving portable generators manufactured since 2007 to understand why those users ignored the product labeling and to conduct a study that includes a human factors analysis to determine the effectiveness of the CPSC mandated CO warning adopted in 2007. In any event, PGMA encourages CPSC to revise the mandated warning to incorporate the standards and format in ANSI Z535.3-2011 and Z535.4-2011.

V. CPSC SHOULD PROACTIVELY ENCOURAGE STATES AND MUNICIPALITIES TO MAKE CO MONITORS IN LIVING SPACES MANDATORY

CPSC also recognizes that “[a]nother important line of defense against CO poisoning is having CO alarms on each level of the home and outside sleeping areas. Based on available alarm data, 93 percent of CO-related deaths involving generators take place in homes with no CO alarms. Much like smoke alarms designed to alert consumers about smoke or fires, CO alarms are designed to alert consumers to dangerous CO levels and give them time to get out of the house before becoming incapacitated.” (CPSC Press Release #12-278, September 14, 2012). States and local communities throughout the United States have recognized the role CO monitors play in protecting consumers from the multiple sources of CO present in everyday life – furnaces, space heaters, and charcoal grills to name a few. As a result, the number of states adopting mandatory CO monitor laws and codes has increased significantly over the last 5 years. PGMA encourages the adoption of such a requirement in every state as a cost effective means of significantly reducing the CO hazard from multiple sources. CPSC could use its influence to further promote the adoption of statutes, regulations and building codes requiring the use of CO monitors in living spaces as a means of implementing its objective of protecting consumers. PGMA and its member companies would be willing to work cooperatively with the CPSC in an effort to encourage states and municipalities to mandate CO detectors.

VI. PGMA IS ACTIVELY INVOLVED WITH EDUCATION/AWARENESS EFFORTS

In addition to developing a portable generator safety standard by means of the canvass process of the American National Standards Institute (ANSI), PGMA has been actively involved with several efforts to raise awareness of the carbon monoxide hazard associated with portable generators. It is important to recognize that any potential technical approach to the CO issue would only address products manufactured in the future. Legacy products must be addressed through education/awareness campaigns, since portable generators tend to have a very long life due to infrequent use.

Recent PGMA education/awareness activities are detailed below:

- In February 2013, PGMA made a proposal at a National Association of Regulatory Utility Commissioners (NARUC) meeting to standardize the portable generator safety information regarding carbon monoxide on all electric utility websites. The standardized information was developed by PGMA. In July 2013, NARUC approved a resolution that this information should be posted on utility websites.
- In December 2013, PGMA launched its "Safety First" carbon monoxide awareness campaign. Campaign kits were sent out to approximately 1300 media outlets, which included the following:
 - Carbon Monoxide Alarm Facts
 - Emergency Checklist
 - Carbon Monoxide facts
 - News Release
 - Public Service Announcement Radio Script
 - Video
- PGMA is currently planning substantial additional education/awareness activity for 2014.

In closing, PGMA remains committed to the development of an appropriate safety standard for portable generators as well as continued education/awareness efforts in the future. We are asking for CPSC's support of these efforts. PGMA shares with CPSC the goal of promoting and continuously improving the safe and proper use of portable generators, and we look forward to continuing discussions on this very important topic.

Sincerely,

A handwritten signature in black ink that reads "Joseph Harding". The signature is written in a cursive style with a large, prominent "J" and "H".

JOSEPH HARDING
Technical Director
PGMA

JH/jlb
pgma

cc: Colin Church, CPSC Voluntary Standards Coordinator, cchurch@cpsc.gov
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